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12 Attorneys for Defendants Commonwealth of the Northern Mariana Islands,
13 Nicole C. Forelli, William C. Bush, D. Douglas Cotton, L. David Sosebee,
14 Andrew Clayton, and Pamela S. Brown (CNMI Defendants)

15 UNITED STATES DISTRICT COURT

16 FOR THE NORTHERN MARIANA ISLANDS

17 ROBERT D. BRADSHAW,) CIVIL ACTION NO. 05-0027

18 Plaintiff,)

19 vs.)

20 COMMONWEALTH OF THE)
21 NORTHERN MARIANA ISLANDS,)
22 NICOLE C. FORELLI, WILLIAM C.)
23 BUSH, D. DOUGLAS COTTON,)
24 L. DAVID SOSEBEE, ANDREW)
25 CLAYTON, UNKNOWN AND)
UNNAMED PERSONS IN THE CNMI)
OFFICE OF THE ATTORNEY)
GENERAL, ALEXANDRO C. CASTRO,)
JOHN A. MANGLONA, TIMOTHY H.)
BELLAS, PAMELA S. BROWN,)
ROBERT A. BISOM, AND JAY H.)
SORENSEN,)

Defendants.)

) **CNMI DEFENDANTS' MOTION
TO ENLARGE TIME TO
RESPOND TO THIRD AMENDED
COMPLAINT [FED. R. CIV. P. 6(b)];
PROPOSED ORDER;
CERTIFICATE OF SERVICE**

Hearing: None requested
Time: N/A
Judge: Hon. Alex R. Munson

**CNMI DEFENDANTS' MOTION TO ENLARGE TIME
TO RESPOND TO THIRD AMENDED COMPLAINT
[FED. R. CIV. P. 6(b)]**

The Commonwealth of the Northern Mariana Islands (CNMI) Office of the Attorney General on behalf of defendants CNMI, Nicole C. Forelli, William C. Bush, D. Douglas Cotton, L. David Sosebee, Andrew Clayton and Pamela S. Brown (CNMI defendants) respectfully move pursuant to Federal Rule of Civil Procedure Rule 6(b) and Local Rule 7.1.h.2. that this Court enlarge time for CNMI defendants to file an answer or responsive pleading to plaintiff's Third Amended Complaint up to and including Friday, 20 October 2006.

No enlargement of time to respond to the Third Amended Complaint has previously been obtained by the CNMI defendants, though pursuant to stipulation the time for defendant Robert A. Bisom to respond was enlarged by Court order dated Tuesday, 3 October 2006 until Friday, 20 October 2006. See Local Rule 7.1.h.2.(a) (total increase of time previously obtained by the parties).

In support of their motion, CNMI defendants submit that the complaint is 71 pages long and inartfully drafted, making it a complicated document to decipher and respond to in a comprehensible manner. See Local Rule 7.1.h.2.(b) (reason for the particular increase requested). Granting the motion will ultimately advance resolution of this matter by allowing the adversary system to fully focus and present the relevant issues to the Court for disposition, as opposed to postponing issues for subsequent consideration. CNMI defendants also note that in light of the enlargement granted to defendant Bisom, there is unlikely to be any deleterious effect on other scheduled dates in this matter. See Local Rule 7.1.h.2.(c) (effect on other scheduled dates).

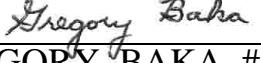
1 WHEREFORE, defendants respectfully request that this Court enter an Order
2 enlarging the deadline for Defendants to file a responsive pleading to plaintiff's Third
3 Amended Complaint up to and including Friday, 20 October 2006.

4

5 Respectfully submitted,

6 OFFICE OF THE ATTORNEY GENERAL
7 MATTHEW T. GREGORY # F0205
8 Attorney General

9 Dated: Tuesday, 3 October 2006.

10 
11 GREGORY BAKA # F0199
12 Deputy Attorney General

13 Attorneys for Defendants Commonwealth of
14 the Northern Mariana Islands, Nicole C.
15 Forelli, William C. Bush, D. Douglas Cotton,
16 L. David Sosebee, Andrew Clayton, and
17 Pamela S. Brown (CNMI Defendants)

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(d), the undersigned declarant states as follows:

1. I am eighteen years of age or older, and I certify that I caused to be served the following documents to the last known address(es) listed below on the date(s) indicated.

**CNMI DEFENDANTS' MOTION TO ENLARGE TIME TO RESPOND TO
THIRD AMENDED COMPLAINT [FED. R. CIV. P. 6(b)]; PROPOSED
ORDER; CERTIFICATE OF SERVICE**

2. As set forth below, this service was accomplished either by personal delivery; U.S. Mail; deposit with the Clerk of Court (in attorney's box), cf. Fed. R. Civ. P. 5(b)(2)(D); or electronic service, see Local Rule 5.1.

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Via Electronic Service

3. I declare under penalty of perjury that the foregoing is true and correct. Executed
on Tuesday, 3 October 2006.

Gregory Baha
Deputy Attorney General
Attorney for CNMI Defendants